

BILL OF COMPLAINT

IN THE CIRCUIT COURT FOR FREDERICK COUNTY

FREDERICK COUNTY, TO WIT:

Mary Ruth Culler (nee Harner), and :
 John M. Culler, her husband, Alden :
 E. Fisher, Attorney-in-Fact for :
 Archibald E. Fisher, and Vallie :
 Fisher, wife of Archibald E. Fisher, :
 Edith J. Schildknecht, widow, and :
 John M. Culler, III and Patricia :
 Ann Culler, infants, by John M. :
 Culler, their father and next :
 friend. :

No. 16876 Equity

vs.

John M. Culler, III and Patricia Ann :
 Culler, infants. :

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Your Orators, complaining say:

FIRST: That by deed dated March 6th, 1939, a life interest in a certain lot or parcel of ground, known as 232 South Market Street, in the City of Frederick, Maryland, together with improvements thereon, was conveyed by Mary E. Fisher, widow, to Mary Ruth Harner, who has since intermarried with John M. Culler, which deed is recorded in Liber 416, folio 260, one of the Land Records of Frederick County, a certified copy of which deed is filed herewith, marked "Exhibit A", and prayed to be taken as a part hereof.

SECOND: That upon the death of the said Mary E. Fisher, who had reserved a prior life estate unto herself in the said property, Mary Ruth Culler (nee Harner) entered upon, and took possession of, the said property, and is presently collecting the rents therefrom.

THIRD: That the aforesaid deed creates a life tenancy in Mary Ruth Culler, with remainder to her children, but if the